

TRINA A. HIGGINS, United States Attorney (#7349)  
STEPHEN L. NELSON, Assistant United States Attorney (#9547)  
Attorneys for the United States of America  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682  
Email: Stephen.Nelson@usdoj.gov

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GILDARDO RAMIREZ GARCIA,

Defendant.

Case No. 2:23mj289-DAO

**SEALED COMPLAINT**

COUNT 1: Possession of Cocaine with  
Intent to Distribute, 21 U.S.C. § 841(a)(1)

Judge Daphne A. Oberg

---

Before Daphne A. Oberg, United States Magistrate Judge for the District of Utah,  
appears the undersigned, who on oath deposes and says:

**COUNT 1**  
**21 U.S.C. § 841(a)(1)**  
**(Possession of Cocaine with Intent to Distribute)**

On or about March 30, 2023, in the District of Utah,

GILDARDO RAMIREZ GARCIA,

the defendant herein, did knowingly and intentionally possess with the intent to distribute cocaine, a Schedule II controlled substance, within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1) and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

This Complaint is made on the basis of investigation described in the affidavit below, and with the following elements for the charged counts as follows:

The elements of Count 1, violation of 21 U.S.C. § 841(a)(1), Possession of Cocaine with Intent to Distribute are:

- a. The defendant knowingly and intentionally possessed cocaine with intent to distribute as charged; and
- b. The substance was, in fact, cocaine, a Schedule II Controlled Substance.

### **AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT**

Complainant, Brett Taylor, being duly sworn, hereby states that this Felony Complaint is based on information obtained through an investigation consisting of the following:

1. Your affiant is a Special Agent with the FBI and has been employed by the FBI since February of 2022. Your affiant is currently assigned to the FBI Wasatch Metro Drug Task Force (WMDTF) and is tasked with investigating street gangs and drug trafficking. As a Special Agent with the FBI, your affiant has participated in several investigations involving drug trafficking activities in violations of 21 U.S.C. §§ 841 and 846. Additionally, your affiant has participated in investigations that involve sophisticated electronic surveillance methods to include GPS vehicle trackers, pen register/trap and trace devices, and court authorized Title III wire intercepts. Your affiant is also familiar with the appearance, packaging, common usage, and terminology regarding controlled substances through your affiant's training, experience, and observation. Your affiant is familiar with the facts and circumstances alleged in this

complaint.

2. The Wasatch Metro Drug Task Force (“WMDTF”), consisting of the Federal Bureau of Investigation (“FBI”) and Davis Metro Narcotic Strike Force (“DMNSF”), is conducting a criminal investigation into GILDARDO RAMIREZ GARCIA (“GARCIA”) and other co-conspirators of a Drug Trafficking Organization (“DTO”) believed to be facilitating the distribution of large quantities of narcotics throughout Utah.

3. During the investigation, agents sought and obtained a court-authorized search warrant to search GARCIA’s residence located in Salt Lake County, Utah.

4. On or about March 30, 2023, WMDTF agents executed this warrant and searched GARCIA’s residence.

5. During the search of the residence, agents were able to locate and seize approximately 941.0 grams of field tested-positive cocaine in suitcase located in GARCIA’s bedroom.

6. During a post-*Miranda* interview, CAMPOS admitted knowledge of the cocaine inside the suitcase and admitted that the cocaine belonged to him.

7. I know from training and experience that this amount of cocaine is consistent with distribution as opposed to personal use.

Based on the foregoing information, I respectfully request an arrest warrant be issued for GARCIA for violation of 21 U.S.C. § 841(a)(1), Possession of Cocaine with Intent to Distribute.

*/s/ Brett Taylor*

---

Brett Taylor  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO BEFORE ME this 31st day of March 2023.

*Daphne A. Oberg*

---

Judge Daphne. A Oberg  
United States Magistrate Judge

APPROVED AS TO FORM:

TRINA A. HIGGINS  
United States Attorney

*/s/ Stephen L. Nelson*

---

Stephen L. Nelson  
Assistant United States Attorney